

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

HELENA KRIZEK

Plaintiff,

-against -

THE QUEENS MEDICAL CENTER, DR.
CHERYLEE CHANG, DR. THOMAS S.
GALLACHER, DR. NOBUHIRO ARIYOSHI,
EDQUON LEE, ESQ., MARGARET WILLE
AND ASSOCIATES LLC., MARGARET
WILLE, ESQ., WILLIAM BORDNER
EDQ.M DR. HAO CHIH H, LEGACY OF
LIFE HAWAII, HAWAII STATE
DEPARTMENT OF HEALTH, DR.
CHRISTOPHER HAPPY MEDICAL
EXAMINER OF HONOLULU, IN HIS
OFFICIAL & INDIVIDUAL CAPACITY.

Defendants


Case No. 24-cv-07727-JHR

NOTICE OF MOTION

*Oral Argument Will be Held On A Date and
Time To Be Designated By the Court.*

PLEASE TAKE NOTICE, that upon the supporting memorandum of law, affidavit of Matthew K. Flanagan submitted in support thereof, William Bordner will move this Court for an order pursuant to Federal Rule of Civil Procedure 12(b)(2) and 12(b)(3) dismissing Plaintiffs' First Amended Complaint, in its entirety, based on lack of personal jurisdiction over Bordner and improper venue.

Dated: New York, New York
November 25, 2024



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